

might justify expanding the regulatory burden on LECs are cited, nor are any self apparent.⁷⁶

USWC and the majority of the commentators in this proceeding appear to agree with NTCA that the Commission should withdraw its proposed rules.⁷⁷

B. The Commission Should Establish A Proceeding To Develop N11 Reservation And Assignment Policies

The commentators raise a substantial number of potential uses for N11 numbers -- in fact, more potential uses than there are available N11 numbers.⁷⁸ It is clear that the limited supply of numbers cannot accommodate all of the potential uses identified by the commentators, regardless of their potential benefit to the public. It is apparent that the Commission should develop principles to guide the reservation, and assignment of the limited N11 resource. This view is supported by AT&T: "[T]he allocation of critical, scarce numbering resources such as N11 codes should not proceed. . . until the Commission has adopted comprehensive policies and rules assuring. . . fair and efficient use."⁷⁹

⁷⁶NTCA at 2.

⁷⁷See Ad Hoc at 2, 3; Ameritech at 3-11; AT&T at 2; Bell Atlantic at 1, 6; BTNA at 4; Centel at 1; GTE at 1-2; IIA at 1-3, 6; ITAA at 1, 3-4, 10; MFS at 1, 7-8; NYNEX at 3-8; Pacific at 3-13, 21; Rochester at 3-4, 7; SNET at 2-4; Sprint at 1, 11; SWBT at 1-10; USTA at 33.

⁷⁸See Section II.A. infra.

⁷⁹AT&T at 2.

USWC recommends that the Commission consider applying the following principles to the assignment of N11 numbers:

The public interest has been well served by the use of N11 numbers for public applications, such as 911 for emergency services. The very limited supply of the remaining N11 numbers should be conserved for future public interest applications, as sanctioned by the appropriate regulatory bodies as meeting a public interest standard.

The principles should be adopted by the NANP Administrator, and should apply consistently throughout World Zone 1 to all common carriers on the public switched telephone network.

N11 numbers should not be used for commercial applications.

The use of 911 for emergency services should be formally recognized and sanctioned by the Commission as meeting the public service standard.

C. The Commission Should Establish A Proceeding To Develop Principles To Guide The Development Of Abbreviated Dialing Arrangements For ISPs

While commentators in this proceeding differ on whether the assignment of N11 numbers to ISPs would be appropriate, there is substantial agreement that the feasibility of alternative addressing schemes should be further pursued. Several participants in this proceeding have identified alternative ISP dialing arrangements, including 555-XXXX, N11-XXXX,⁸⁰ N11-XXX-

⁸⁰BTNA at 6: "BTNA believes that the appropriate model is the 7-digit uniform access number." Also IIA at 3 (footnote omitted): "IIA has concluded that these codes should be used as service access codes to increase their availability from a mere six numbers to up to 10,000 per code when based on application and used in a seven digit assignment scheme;" ITAA at 9: "[Seven digit access numbers] would be a far more beneficial step towards building a nationwide information services infrastructure than the introduction of interim three-digit access on a localized basis." Also AT&T at 4: "N11 codes could also be used as new service access codes in seven-digit dialing;" Pacific at 19: "One
(continued...)"

XXXX,⁸¹ NXX#,⁸² and N11 gateways.⁸³ Each of these alternatives would avoid the problem of conferring an unfair competitive advantage on a few ISPs by making available a dialing arrangement that could accommodate 10,000 or more ISPs. Before the industry can properly weigh the relative cost and benefits of these and other alternatives, it would be appropriate for the Commission to develop principles that would guide the industry in this effort. USWC would propose the following principles:

The public interest will be served by facilitating the growth of the information services industry through the adoption of a network infrastructure and associated addressing scheme that promotes efficient and convenient end user access to a broad spectrum of information services provided by a wide choice of information service providers through the public switched telephone network.

The information services industry will best be served by the adoption of national standards for end user access.

Any addressing scheme adopted for use by the information services industry should promote a diversity of information sources. Any dialing arrangement adopted for access to information services should reasonably accommodate a maximum number of information service providers, and should not confer an unreasonable competitive advantage to any industry member.

⁸⁰(...continued)

alternative would be to use another 7 digit number that is easily recognizable Certainly, a dialing pattern which connects to 10,000 providers is preferable to an N11 which provides connection to [only] one party;" SWBT at 12: "[T]he Commission might set aside the 555-XXXX format . . . for all service providers wanting a number both easy to remember and use."

⁸¹See IIA at 3.

⁸²See Ameritech at 12-14.

⁸³See Bell Atlantic at 1-5; SNET at 5-6; USTA at 6.

D. The Commission Should Refer The Development Of An ISP Addressing Arrangement To An Appropriate Industry Forum

Once the Commission has developed a set of guiding principles that would govern the development of an addressing scheme for ISPs,⁸⁴ the actual development could best be accomplished by an appropriate industry forum, such as the IILC or the Long Range Numbering Plan Forum.⁸⁵

IV. CONCLUSION

For the foregoing reasons, the Commission should not adopt the N11 rules proposed in the NPRM. Instead, the Commission should proceed to develop principles that will govern the future assignment of N11 numbers for national, public service applications, and develop principles that will govern the development of ISP addressing arrangements. The Commission should refer the matter to an appropriate industry forum for investigation of alternative ISP addressing arrangements, such as 555-XXXX, N11-XXXX, NXX#, and N11 gateways, and the preparation

⁸⁴Any addressing scheme developed and deployed for ISP use should be available without restrictions to non-ISPs as well. See Section II.B. supra.

⁸⁵BTNA at 6 (footnote omitted): "[T]he Commission should direct IILC participants to devise a plan which will promptly provide nationwide uniform 7-digit line-side access numbers." Also BellSouth at i-ii: "BellSouth urges the Commission to facilitate expedited industry efforts to develop a solution through an appropriate industry forum such as the IILC."

of a report that provides recommendations for the Commission's consideration.

Respectfully submitted,

U S WEST Communications, Inc.

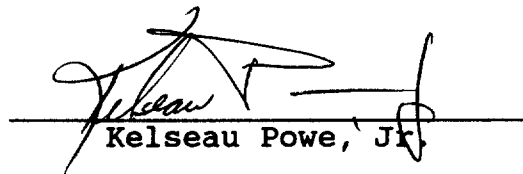
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July 13, 1992

CERTIFICATE OF SERVICE

I, Kelseau Powe, Jr., do hereby certify on this 13th day of July, 1992, that I have caused a copy of the foregoing **REPLY COMMENTS OF U S WEST COMMUNICATIONS, INC.** to be served, via first class United States mail, postage prepaid, to the persons named on the attached service list.


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